

HEATHER E. WILLIAMS, SBN #122664
Federal Defender
DOUGLAS BEEVERS, SBN # 288639
Assistant Federal Defender
Designated Counsel for Service
801 I Street, 3rd Floor
Sacramento, CA 95814
Telephone: (916) 498-5700
Fax: (916) 498-5710

Attorneys for Defendant
VIN WHEALEN GAINES JR.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 2:20-cr-00208-JAM
)	
Plaintiff,)	STIPULATION AND ORDER
)	TO CONTINUE STATUS
vs.)	CONFERENCE AND EXCLUDE TIME
)	
VIN WHEALEN GAINES JR.,)	Date: January 18, 2022
)	Time: 9:30 a.m.
Defendant.)	Judge: Hon. John A. Mendez

IT IS HEREBY STIPULATED by and between Phillip A. Talbert, United States Attorney, through David Spencer, Attorney for Plaintiff, and Heather Williams, Federal Defender, through Assistant Federal Defender Douglas Beevers, Attorney for Defendant Vin Whealen Gaines, Jr., **that the Status Conference scheduled for January 18, 2022 may be continued to February 1, 2022 at 9:30 a.m.**

The parties specifically stipulate as follows:

1. By previous order, this matter was set for a status on January 18, 2022.
2. By stipulation, Mr. Gaines now moves to continue the status conference to February 1, 2022 at 9:30 a.m.
3. Defense counsel requires additional time to continue the factual investigation, review discovery, and conduct necessary legal research to determine an appropriate resolution in this matter.
4. The government does not object to the continuance.

1 5. Based upon the foregoing, the parties further stipulate that for the purpose of
2 computing time under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.*, the time between January
3 18, 2022 and February 1, 2022 (inclusive) should be deemed excludable pursuant to 18 U.S.C. §
4 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance granted by the
5 Court at the defense's request based upon a finding that the ends of justice served by granting the
6 continuance outweighs the best interest of the public and Mr. Gaines in a speedy trial.

7
8 Respectfully submitted,

9 HEATHER E. WILLIAMS
Federal Defender

10 Date: January 14, 2022

11 /s/ Douglas Beevers
DOUGLAS BEEVERS
12 Assistant Federal Defender
Attorney for Defendant
VIN WHEALEN GAINES JR.

13
14 Date: January 14, 2022

PHILLIP TALBERT
United States Attorney

15 /s/ David Spencer
DAVID SPENCER
16 Assistant U.S. Attorney
17 Attorney for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Date: January 18, 2022

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
UNITED STATES DISTRICT COURT JUDGE